

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

ALL CASES

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

**SAINT THOMAS ENTITIES' MOTION TO COMPEL AMERIDOSE LLC TO
PRODUCE DOCUMENTS REQUESTED IN THE STE'S
SECOND REQUEST FOR PRODUCTION**

The Saint Thomas Entities¹ hereby move to compel Ameridose LLC to produce documents requested in the Saint Thomas Entities' Second Request for Production. In support of their Motion, the Saint Thomas Entities refer the Court to their Memorandum in Support, filed herewith. Ameridose's Response to the Second Request for Production (which repeats the requests verbatim) is attached as Exhibit 1 to the Memorandum.

¹ Saint Thomas West Hospital f/k/a St. Thomas Hospital, Saint Thomas Network, and Saint Thomas Health.

SAINT THOMAS WEST HOSPITAL,
FORMERLY KNOWN AS ST. THOMAS
HOSPITAL, SAINT THOMAS NETWORK,
AND SAINT THOMAS HEALTH

By their attorneys,

/s/ Sarah P. Kelly

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Dated: August 25, 2015

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*Appearing *Pro Hac Vice*

LOCAL RULES 7.1 and 37.1 Certificate of Conference

I hereby certify that counsel for the Saint Thomas Entities has conferred with counsel for Ameridose on the issues presented in this motion on a number of occasions but has not been able to narrow or resolve the issues presented.

/s/ Sarah P. Kelly

SARAH P. KELLY

CERTIFICATE OF SERVICE

This certifies that a true and accurate copy of the foregoing was served on all parties of record by virtue of the Court's electronic filing system this 25th day of August, 2015.

/s/ Sarah P. Kelly

SARAH P. KELLY

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